

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

POWER INTEGRATIONS, INC., a
Delaware corporation,

Plaintiff,

v.

FAIRCHILD SEMICONDUCTOR
INTERNATIONAL, INC., a Delaware
corporation, and FAIRCHILD
SEMICONDUCTOR CORPORATION, a
Delaware corporation,

Defendants.

C.A. No. 04-1371 JJF

PUBLIC VERSION

**DECLARATION OF SEAN P. HAYES IN SUPPORT OF
POWER INTEGRATIONS' COMBINED OPPOSITION TO FAIRCHILD'S
NINETEEN (19) MOTIONS *IN LIMINE***

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Attorneys for Plaintiff
POWER INTEGRATIONS, INC.

Dated: September 11, 2006

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

POWER INTEGRATIONS, INC., a
Delaware corporation,

Plaintiff,

v.

FAIRCHILD SEMICONDUCTOR
INTERNATIONAL, INC., a Delaware
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SEMICONDUCTOR CORPORATION, a
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**DECLARATION OF SEAN P. HAYES IN SUPPORT OF
POWER INTEGRATIONS' COMBINED OPPOSITION TO FAIRCHILD'S
NINETEEN (19) MOTIONS *IN LIMINE***

I, Sean P. Hayes, declare as follows:

1. I am an attorney at Fish & Richardson P.C., counsel of record in this action for Plaintiff Power Integrations, Inc. ("Power Integrations"). I am a member of the Bar of the State of Delaware and of this Court. I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.
2. Attached hereto as Exhibit A is a true and correct copy of an excerpt of the March 31, 2006 deposition of Shawn Slayton.
3. Attached hereto as Exhibit B is a true and correct copy of an excerpt of the list of documents considered by Richard Troxel and the Highly Confidential – Outside Counsel Only document bearing Bates numbers PIF 53045-46, also from that report.
4. Attached hereto as Exhibit C is a true and correct copy of an excerpt of the August 25, 2006 Highly Confidential deposition transcript of Richard B. Troxel.
5. Attached hereto as Exhibit D is a true and correct copy of a May 11, 2006 letter from Michael R. Headley to Bas de Blank re U.S. manufacturing.

6. Attached hereto as Exhibit E is a true and correct copy of a May 22, 2006 letter from Michael R. Headley to Brian VanderZanden re U.S. manufacturing.

7. Attached hereto as Exhibit F is a true and correct copy of a June 7, 2006 email from Michael R. Headley to Brian VanderZanden re U.S. manufacturing discovery.

8. Attached hereto as Exhibit G is a true and correct copy of a July 10, 2006 letter from Michael R. Headley to Bas de Blank re U.S. manufacturing documents.

9. Attached hereto as Exhibit H is a true and correct copy of a July 15, 2006 letter from Michael R. Headley to Bas de Blank re U.S. manufacturing.

10. Attached hereto as Exhibit I is a true and correct copy of an excerpt of the September 13, 2005 Attorneys' Eyes Only deposition of Chang-Sik Lim.

11. Attached hereto as Exhibit J is a true and correct copy of an excerpt of the February 16, 2006 Highly Confidential – Outside Counsel Only deposition of Mike Shields.

12. Attached hereto as Exhibit K is a true and correct copy of a January 23, 2006 email from Jeff Bragalone re documents produced by Intersil.

13. Attached hereto as Exhibit L is a true and correct copy of an excerpt of the October 27, 2005 Highly Confidential deposition transcript of Jan Brunnberg.

14. Attached hereto as Exhibit M is a true and correct copy of a May 2, 2006 email from Michael Headley to Brian VanderZanden re prior art dates.

15. Attached hereto as Exhibit N is a true and correct copy of a May 22, 2006 letter from Michael R. Headley to Brian VanderZanden re a prior art stipulation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 11th day of September, 2006, at Wilmington, Delaware.

/s/ Sean P. Hayes

Sean P. Hayes

CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2006, I served the **PUBLIC VERSION OF DECLARATION OF SEAN P. HAYES IN SUPPORT OF POWER INTEGRATIONS' COMBINED OPPOSITION TO FAIRCHILD'S NINETEEN (19) MOTIONS *IN LIMINE*** on the following:

BY ELECTRONIC MAIL

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INTERNATIONAL, INC. and
FAIRCHILD SEMICONDUCTOR
CORPORATION

/s/ Sean P. Hayes

Sean P. Hayes